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9 Counsel for Respondents
10 George T. Simmons and Janet B. Simmons
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AZ CORP COMMISSION
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

9 COMMISSIONERS

Arizona Corporation Commission

DOCKETED

FEB 22 2016

10 DOUG LITTLE, Chairman
11 BOB STUMP
12 BOB BURNS
13 TOM FORESE
14 ANDY TOBIN

DOCKETED BY

KE

15 In the matter of:

DOCKET NO. S-20938A-15-0308

16 USA BARCELONA REALTY ADVISORS,
17 LLC, an Arizona limited liability company,

**REQUEST FOR HEARING
OF RESPONDENTS
GEORGE T. SIMMONS AND
JANET B. SIMMONS**

18 USA BARCELONA HOTEL LAND
19 COMPANY I, LLC, an Arizona limited liability
20 company,

21 RICHARD C. HARKINS, an unmarried man,

22 ROBERT J. KERRIGAN (CRD no. 268516)
23 An unmarried man,

24 GEORGE T. SIMMONS and JANET B.
25 SIMMONS, husband and wife,

26 BRUCE ORR, an unmarried man,

27 Respondents.
28

29 Pursuant to AAC Rules R14-4-306 and R14-4-307, Respondents George T. Simmons and
30 Janet B. Simmons ("Simmons") reiterate the request for a hearing regarding the Amended

1 Temporary Order to Cease and Desist and Notice of Opportunity for hearing filed on January 25,
2 2016 (the "Amended Order"). Simmons filed an initial Request for Hearing in this Docket No. S-
3 20938A on September 11, 2015. Simmons renews that request with respect to the Amended
4 Order. Counsel for Simmons give notice that they have not yet been served with the Amended
5 Order, which was mailed "c/o Charles Barry, One East Washington, Suite 1200, Phoenix, AZ
6 85004," which was Charles R. Berry's address at a former firm prior to November, 2014.

7 DATED February 19, 2016.

8 Clark Hill PLC

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By: Charles R. Berry
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Scottsdale, AZ 85254
Counsel for Respondents Simmons

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1 ORIGINAL and thirteen copies of the foregoing
2 filed this 19 day of February, 2016 with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, AZ 85007

7 COPY of the foregoing hand-delivered
8 This 19 day of February, 2016 to:

9 Matthew J. Neubert
10 Director of Securities
11 Securities Division
12 Arizona Corporation Commission
13 1300 W. Washington Street, 3rd Floor
14 Phoenix, AZ 85007

15 Hearing Officer
16 Hearing Division
17 Arizona Corporation Commission
18 1200 W. Washington Street
19 Phoenix, AZ 85007

20 COPY of the foregoing mailed
21 this 19 day of February, 2016 to:

22 Paul Kitchin
23 Securities Division
24 Arizona Corporation Commission
25 1300 W. Washington, 3rd Floor
26 Phoenix, AZ 85007

27 USA Barcelona Realty Advisors, LLC
28 c/o Richard C. Harkins
4422 East Lupine Avenue
Phoenix, AZ 85028

USA Barcelona Hotel Land Company I, LLC
c/o Richard C. Harkins
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6 Phoenix, AZ 85016
7 Counsel for Robert J. Kerrigan

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